SIDLEY AUSTIN BROWN & WOOD LLP

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BRUSSELS
CHICAGO, ILLINOIS 60603
TELEPHONE 312 853 7000
FACSIMILE 312 853 7036
www.sidley.com
FOUNDED 1866

LOS ANGELES
NEW YORK
SAN FRANCISCO
SHANGHAI
SINGAPORE
TOKYO
WASHINGTON, D.C.

WRITER'S DIRECT NUMBER (312) 853-7694

WRITER'S E-MAIL ADDRESS sgourley@sidley.com

September 19, 2005

By Facsimile (Letter Only) and Federal Express

Clerk of the Panel Judicial Panel on Multidistrict Litigation One Columbus Circle, N.E. Thurgood Marshall Federal Judiciary Building Room G-255, North Lobby Washington, D.C. 20002-8004

Re: MDL-1699 In re Bextra and Celebrex Marketing, Sales Practices, and Products Liability Litigation

Dear Clerk of the Panel:

Pursuant to Rule 7.5(e) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigiation, defendant Pfizer Inc., by its attorneys, hereby notifies the Panel of the potential tag-along actions in MDL-1699 listed on the attached Schedules A and B.

Schedule A lists the actions that do not include claims against Merck & Co. related to Vioxx. Schedule B lists the actions that do allege claims against Merck & Co. related to Vioxx, in addition to the claims relating to Bextra and Celebrex.

Enclosed are copies of the complaint and docket sheet (where available) for each action. Please do not hesitate to contact me if you have any questions about the above.

SIDLEY AUSTIN BROWN & WOOD LLP

CHICAGO

Clerk of the Panel September 14, 2005 Page 2

Very truly yours,

Sam of Souly Pened

Sara J. Gourley

Enclosures

cc: Counsel of Record (Letter Only)

SCHEDULE A

Middle District of Alabama

Robert Webb v. G.D. Searle, LLC. et al., C.A. No. 1:05-500, Hon. Myron H. Thompson Frank Klinger v. G.D. Searle, LLC. et al., C.A. No. 2:05-475, Hon. Susan Russ Walker Clarice Hare v. G.D. Searle, LLC. et al., C.A. No. 2:05-476, Hon. Mark E. Fuller Barbara Clem v. G.D. Searle, LLC. et al., C.A. No. 1:05-593, Hon. Myron H. Thompson Phyllis McCord v. G.D. Searle, LLC. et al., C.A. No. 2:05-594, Hon. Mark E. Fuller Katie Thomas v. Pfizer, Inc. et al., C.A. No. 2:05-824, Hon. Susan Russ Walker Rosa M. Nelson v. Pfizer, Inc. et al., C.A. No. 2:05-832, Hon. Mark E. Fuller Ozzie Jackson v. Pfizer, Inc. et al., C.A. No. 2:05-841, Hon. Mark E. Fuller

Northern District of Alabama

Gloria Mauldin v. Pfizer Inc., C.A. No. 2:05-1670, Hon. Paul W. Greene Mary Nell McCloud v. G.D. Searle, LLC. et al., C.A. No. 2:05-1799, Hon. John E. Ott Samanthia Russell v. G.D. Searle, LLC. et al., C.A. No. 7:05-1280, Hon. L. Scott Coogler Southern District of Alabama

Cliff Norwood v. G.D. Searle, LLC. et al., C.A. No. 1:05-360, Hon. Virgil Pittman James Alan Bell v. G.D. Searle, LLC. et al., C.A. No. 1:05-361, Hon. Virgil Pittman James Rogers Fanning v. G.D. Searle, LLC. et al., C.A. No. 1:05-388, Hon. Virgil Pittman John Scarcliff v. G.D. Searle, LLC. et al., C.A. No. 1:05-397, Hon. W. B. Hand Albert Pearson v. G.D. Searle, LLC. et al., C.A. No. 1:05-454, Hon. W. B. Hand Wilmer Merriweather v. G.D. Searle, LLC. et al., C.A. No. 2:05-368, Hon. Sonja F. Bivins

Central District of California

Robert Schwartz v. G.D. Searle LLC. et al., C.A. No. 2:05-3851, Hon. S. James Otero

William Acosta et al. v. Pfizer Inc. et al., C.A. No. 2:05-6130, Hon. S. James Otero

Lillie Baker v. Pfizer Inc., C.A. No. 5:05-283, Hon. Virginia A. Phillips

District of Connecticut

Thomas Durica et al. v. Pfizer Inc., C.A. No. 3:05-1104, Hon. Janet C. Hall Middle District of Florida

Mary Ellen Mule v. Pfizer Inc., C.A. No. 3:05-695, Hon. Timothy J. Corrigan

Tracy Ring v. G.D. Searle, LLC. et al., C.A. No. 6:05-1174, Hon. Anne C. Conway

Harley W. Horne v. Pfizer, Inc., C.A. No. 8:05-963, Hon. Steven D. Merryday Northern District of Florida

Marie McConnell v. Pfizer Inc., C.A. No. 3:05-123, Hon. Roger Vinson Southern District of Florida

Clara Fontanilles v. Pficer, Inc., C.A. No. 05-21241, Hon. Jose E. Martinez Northern District of Illinois

William Adams et al. v. Pfizer, Inc., C.A. No. 1:05-2101, Hon. James B. Moran

Vernon Shephard v. Pfizer, Inc., C.A. No. 1:05-3991, Hon. William T. Hart

Southern District of Illinois

Barbara Mihalich v. Pfizer, Inc., C.A. No. 3:04-933, Hon. Michael J. Reagan

John J. Driscoll v. Pfizer Inc., C.A. No. 3:05-252, Hon. G. Patrick Murphy

Maurice Dulle v. Pharmacia & Upjohn Company. et al., C.A. No. 3:05-386, Hon. Michael J. Reagan

Southern District of Indiana

Sheet Metal Workers Local No. 20 Welfare and Benefit Fund et al. v. Pfizer, Inc., et al., C.A. No. 1:05-1109, Hon. John D. Tinder

Southern District of Iowa

Kenneth L. Peterson et al. v. Pfizer Inc., C.A. No. 3:05-91, Hon. Charle R. Wolle District of Kansas

John Barker v. G.D. Searle, LLC. et al., C.A. No. 2:05-2127, Hon. Richard D. Rogers

Elizabeth Winlaw v. Pharmacia & Upjohn Company et al., C.A. No. 2:05-2337, Hon. John W. Lungstrum

Doris Storlien v. Joel Weigand, M.D. et al., C.A. No. 6:05-1283, Hon. J. Thomas Marten Western District of Kentucky

John DeHart v. Pfizer, Inc., C.A. No. 3:05-476, Hon. John G. Heyburn, II

Eastern District of Louisiana

Albert Stockfelt et al. v. Pfizer, Inc., C.A. No. 2:05-1873, Hon. Carl Barbier

Sandy Kenny v. Pfizer, Inc., C.A. No. 2:05-2114, Hon. Lance M. Africk

Ronald P. Lockwood v. Pfizer, Inc., C.A. No. 2:05-2138, Hon. Mary Ann Vial Lemmon

Raymond Audler et al. v. Pfizer, Inc., et al., C.A. No. 2:05-2436, Hon. Lance M. Africk

Philip Burnson, Jr. et al. v. Pfizer, Inc., C.A. No. 2:05-3669, Hon. Martin L.D. Feldman Western District of Louisiana

Gayle Swilley et al. v. Pfizer Inc., C.A. No. 1:05-761, Hon. Dee D. Drell

Lessie McCoy v. Pfizer Inc., C.A. No. 5:05-715, Hon. S. Maurice Hicks

Eastern District of Michigan

Frankenmuth Financial Group et al. v. Pfizer, Inc. et al., C.A. No. 2:05-71656, Hon. Victoria A. Roberts

District of Minnesota

Loretta M. Harris v. Pfizer, Inc., C.A. No. 0:05-728, Hon. Michael J. Davis

Rebecca L. Galvan v. Pfizer, Inc., C.A. No. 0:05-803, Hon. David S. Doty

Cheryl M. Snow v. Pfizer, Inc., C.A. No. 0:05-1106, Hon. Michael J. Davis Northern District of Mississippi

Judy Shearer v. Pharmacia, Inc. et al., C.A. No. 2:05-18, Hon. W. Allen Pepper

Southern District of Mississippi

Kathleen Cote v. G.D. Searle LLC et al., C.A. No. 1:05-256, Hon. Dan M. Russell, Jr.

Margaret Stockert v. Pharmacia Corporation et al., C.A. No. 1:05-397, Hon. Dan M. Russell, Jr.

Hugh Rankin Collins et al. v. Pharmacia Corp. et al., C.A. No. 2:05-128, Hon. Keith Starrett

Velma L. Lee v. Pfizer, Inc. et al., C.A. No. 5:05-65, Hon. David C. Bramlette, III

Ernest Lee Pennebaker, Jr. v. Pfizer, Inc., C.A. No. 5:05-110, Hon. David C. Bramlette, III

Eastern District of Missouri

Willie Baskett v. G.D. Searle, LLC. et al., C.A. No. 4:05-720, Hon. Henry E. Autrey

Shriley Mae Nash v. G.D. Searle, LLC. et al., C.A. No. 4:05-871, Hon. Audrey G. Fleissig

JoLinda Haugh v. Pfizer, Inc., C.A. No. 4:05-1162, Hon. Catherine D. Perry

Vern Bowers v. Pfizer Inc. et al., C.A. No. 4:05-1302, Hon. Charles A. Shaw

Edward Vitt v. Pfizer, Inc. et al., C.A. No. 4:05-1303, Hon. Catherine D. Perry

Donald Cross et al. v. G.D. Searle, LLC. et al., C.A. No. 4:05-1343, Hon. Stephen N. Limbaugh

Western District of Missouri

Marjorie Messick v. G.D. Searle LLC. et al., C.A. No. 4:05-489, Hon. Howard F. Sachs

Nancy Jones v. Pfizer, Inc., C.A. No. 4:05-496, Hon. Ortrie D. Smith

Bennie McBroom v. G.D. Searle LLC. et al., C.A. No. 4:05-543, Hon. Scott O. Wright

William Banning et al. v. Pfizer Inc.

Phillip Kanngiesser et al. v. Pfizer Inc.

John Ryan et al. v. Pfizer Inc.

Mary McKinney v. Pfizer Inc.

District of New Jersey

Edward T. Kierstead et al. v. Pfizer, Inc. et al., C.A. No. 2:05-2891, Hon. William J. Martini Roseanne Sachs et al. v. Pfizer, Inc., C.A. No. 2:05-3744, Hon. William J. Martini Eastern District of New York

Phyllis Weber et al. v. Pfizer, Inc. et al., C.A. No. 1:05-3476, Hon. Edward R. Korman Southern District of New York

Michele Sharon Cardamone v. Pfizer, Inc., C.A. No. 1:05-5210, Hon. Kenneth M. Karas Cynthia Young v. Pfizer, Inc., C.A. No. 1:05-5211, Hon. Kenneth M. Karas Cheryl Benford et al. v. Pfizer, Inc., C.A. No. 1:05-7542, Hon. Kenneth M. Karas Toni Skinner et al. v. Pfizer, Inc., C.A. No. 1:05-7543, Hon. Kenneth M. Karas Ronald Lipe et al. v. Pfizer, Inc., C.A. No. 1:05-7544, Hon. Kenneth M. Karas Kathie Stephens et al. v. Pfizer, Inc., C.A. No. 1:05-7587, Hon. Richard M. Berman Denny Clubb et al. v. Pfizer, Inc., C.A. No. 1:05-7588, Hon. Laura Taylor Swain Linda Bentley et al. v. Pfizer, Inc., C.A. No. 1:05-7589, Hon. Deborah A. Batts Bernice Gidseg et al. v. Pfizer, Inc. et al., C.A. No. 1:05-7691, Hon. John G. Koeltl Northern District of Ohio

Sheila Blevins v. G.D. Searle, LLC et al., C.A. No. 3:05-7200, Hon. David A. Katz Southern District of Ohio

Sharon Allen et al. v. G.D. Searle LLC et al., C.A. No. 3:05-194, Hon. Thomas M. Rose Geraldine Aellig et al. v. G.D. Searle LLC et al., C.A. No. 3:05-195, Hon. Thomas M. Rose Betty Bragg et al. v. G.D. Searle LLC et al., C.A. No. 3:05-196, Hon. Walter H. Rice Diane Alexander et al. v. G.D. Searle LLC et al., C.A. No. 3:05-197, Hon. Thomas M. Rose Curtis L. McEldowney, Jr. et al. v. G.D. Searle LLC et al., C.A. No. 3:05-199, Hon. Walter H. Rice

Western District of Oklahoma

Eastern District of Pennsylvania

Ghaleb Awaida v. Pfizer, Inc., C.A. No. 5:05-425, Hon. Lee R. West

Annie Marie Isaacs v. Pfizer, Inc., C.A. No. 5:05-426, Hon. Joe Heaton

District of Oregon

Louis Sneer v. Pfizer, Inc., C.A. No. 3:05-812, Hon. Donald C. Ashmanskas

Keith Cardone v. Pfizer, Inc. et al., C.A. No. 2:05-2169, Hon. Timothy J. Savage

Jose Martinez v. Pfizer, Inc. et al., C.A. No. 2:05-2170, Hon. Robert F. Kelly

Lynnellen Daniels et al. v. Pfizer, Inc. et al., C.A. No. 2:05-2217, Hon. John R. Padova

James F. Adams v. Pfizer, Inc. et al., C.A. No. 2:05-2967, Hon. J. Curtis Joyner

Robert L. Nichols, Jr. et al., v. Pfizer, Inc. et al., C.A. No. 2:05-3469, Hon. J. Curtis Joyner District of South Carolina

Tomm L. Gipe et al. v. Pfizer Inc., C.A. No. 2:05-962, Hon. C. Weston Houck Middle District of Tennessee

Consuelo Solis-King et al. v. Pfizer, Inc., C.A. No. 3:05-321, Hon. Aleta A. Trauger Eastern District of Texas

James A. Trainor v. Pfizer Inc. et al., C.A. No. 1:05-309, Hon. Marcia A. Crone

Raquel M. Jimenez v. Pfizer Inc., C.A. No. 1:05-348, Hon. Thad Heartfield

Dorothy H. Boudreaux v. Pfizer Inc. et al., C.A. No. 1:05-369, Hon. Howell Cobb

Linda Dyer v. Pfizer Inc., C.A. No. 1:05-405, Hon. Marcia A. Crone

Horace Hebert v. Pfizer Inc. et al., C.A. No. 1:05-418, Hon. Howell Cobb

John G. Morphis v. Pfizer Inc., C.A. No. 1:05-431, Hon. Marcia A. Crone

Kathy Lasdin v. Pfizer Inc., C.A. No. 1:05-456, Hon. Marcia A. Crone

James A. Trainor v. Pfizer, Inc., C.A. No. 1:05-459, Hon. Marcia A. Crone

Dora Jeanne Pickens v. Pfizer Inc. et al., C.A. No. 1:05-528, Hon. Howell Cobb

John Knight v. Pfizer, Inc. et al., C.A. No. 1:05-529, Hon. Howell Cobb

George Carey et al. v. Pfizer Inc. et al., C.A. No. 6:05-CV-0342, Hon. William M. Steeger Northern District of Texas

Judy Jones et al. v. Pfizer, Inc. et al., C.A. No. 3:05-736, Hon. A. Joe Fish

Royal B. Nelson et al. v. Pfizer Inc. et al., C.A. No. 3:05-867, Hon. Sidney A. Fitzwater

Carol Cox v. Pfizer Inc., C.A. No. 3:05-1237, Hon. Ed Kinkeade

Mica Lane Uselton et al. v. Pfizer Inc., C.A. No. 4:05-383, Hon. John McBryde Southern District of Texas

- Deborah D. Crow v. Pfizer Inc. et al., C.A. No. 3:05-332, Hon. Samuel B. Kent
- Erma Smith et al. v. Pfizer Inc. et al., C.A. No. 4:05-2417, Hon. Lynn N. Hughes Western District of Texas
- Robert Eugene German et al. v. Pfizer, Inc., C.A. No. 05-411, Hon. Lee Yeakel District of Utah
- Dennis P. Jensen v. Pfizer, C.A. No. 1:05-93, Hon. Bruce S. Jenkins Western District of Virginia
- Billy Bailey et al., Pfizer Inc., C.A. No. 2:05-35, Hon. James P. Jones Northern District of West Virginia
- Dewain L. Howard v. Pfizer, Inc., C.A. No. 3:05-30, Hon. W. Craig Broadwater Southern District of West Virginia
- Barry R. Hudnall et al. v. Pfizer, Inc. et al., C.A. No. 2:05-404, Hon. John T. Copenhaver, Jr.

SCHEDULE B

Northern District of Alabama

- Earl Darby, Jr. v. Merck & Co., Inc. et al., 2:05-896, Hon. Sharon Lovelace Blackburn
- Juanell Y. McBrayer Wilkes et al. v. Merck & Co., Inc. et al., 2:05-1214, Hon. Robert R. Armstrong
- Wynelle S. Davis et al. v. Merck & Co., Inc. et al., C.A. No. 2:05-1809, Hon Sharon Lovelace Blackburn
- Stan Downey et al. v. Merck & Co., Inc. et al., 7:05-1125, Hon R. David Proctor Central District of California
- Doris Arvidson et al. v. Merck & Co. Inc., C.A. No. 2:05-6128, Hon. Florence-Marie Cooper Southern District of California
- William Armbruster et al. v. Merck & Co., Inc., et al., C.A. No. 05-1193, Hon. Larry A. Burns Southern District of Illinois
- Jackie Collins v. Merck & Co. Inc. et al., C.A. No. 3:05-451, Hon. Michael J. Reagan Southern District of Indiana
- Judy Engel v. Merck & Co., Inc. et al., C.A. No. 3:05-73, Hon. Richard L. Young Eastern District of Louisiana
- John Ernest Greenwood Campbell et al., v. Merck & Co., Inc., et al., C.A. No. 2:05-1491, Hon. Eldon E. Fallon
- Rudolph H. Valle et al. v. Merck & Co. Inc. et al., C.A. No. 2:05-2526, Hon. Eldon E. Fallon
- Debra Ignacio v. Merck & Co., Inc. et al., C.A. No. 2:05-2819, Hon. Eldon E. Fallon

District of Minnesota

Mylon Larson et al. v. Merck & Company, Inc. et al., C.A. No. 0:05-1178, Hon. Joan N. Ericksen

Southern District of Mississippi

Leona McFarland et al. v. Merck & Company, Inc. et al., C.A. No. 2:03-247, Hon. Keith Starrett

Bettye J. Magee et al. v. Merck & Company, Inc. et al., C.A. No. 2:03-249, Hon. Keith Starrett

Eastern District of Missouri

Clara Jean Hunter v. Merck & Co., Inc. et al., C.A. No. 4:05-870, Hon. Henry E. Autrey

Lillian Farkas v. Merck & Co., Inc. et al., C.A. No. 4:05-1163, Hon. Henry E. Autrey

Eastern District of New York

Alex Cain et al. v. Merck & Co., Inc. et al., C.A. No. 1:01-3441, Hon. Sterling Johnson, Jr.

Southern District of New York

Matthew Cavallo et al. v. Pfizer, Inc. et al., C.A. No. 1:05-818, Hon. Kenneth M. Karas

Rhonda Parker et al. v. Pfizer, Inc. et al., C.A. No. 1:05-7567, Hon. Victor Marrero

Eastern District of Pennsylvania

Mary Henderson v. Merck & Co., Inc. et al., C.A. No. 2:04-5987, Hon. Legrome D. Davis

Maria Camardella v. Merck & Co., Inc. et al., C.A. No. 2:05-1908, Hon. Ronald L. Buckwalter

Willie Brooks v. Merck & Co., Inc. et al., C.A. No. 2:05-2222, Hon. Gene E.K. Pratter

Eastern District of Texas

Kimberly Morris Blackshire v. Merck & Co., Inc. et al., C.A. No. 1:05-271, Hon. Marcia A. Crone

Sandra H. McClelland v. Merck & Co., Inc. et al., C.A. No. 1:05-371, Hon. Thad Heartfield

Michael Wayne Kennett v. Merck & Co., Inc. et al., C.A. No. 1:05-441, Hon. Marcia A. Crone

Jim Wise v. Merck & Co., Inc. et al., C.A. No. 1:05-552, Hon. Thad Heartfield

James Davis v. Merck & Co., Inc. et al., C.A. No. 2:05-154, Hon. T. John Ward

Northern District of Texas

James Booker v. Merck & Co., Inc. et al., C.A. No. 3:05-496, Hon. Ed Kinkeade

Southern District of Texas

Santos Villarreal Layton v. Dario Arango, M.D. et al., C.A. No. 7:05-149, Hon. Randy Crane